

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT

UNITED STATES OF AMERICA	)	
	)	No. 08 CR 115
v.	)	
	)	Judge Ronald A. Guzman
MARK POLCHAN and	)	
SAMUEL VOLPENDESTO	)	

**GOVERNMENT'S AGREED MOTION FOR A PROTECTIVE ORDER**  
**RELATING TO DISCOVERY**

Now comes the United States of America, by and through Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, and herein seeks leave of this Court for a Protective Order relating to discovery. In support of this motion, the government states as follows:

1. The government has collected various discovery materials that it intends to tender to the defense in this case. These materials are property of the United States. Moreover, significant portions of these materials contain information that is law enforcement sensitive.
2. Counsel for defendants have been contacted and have no objection to the entry of such a protective order in connection with discovery received in this case.

WHEREFORE, the government respectfully requests that a protective order be entered in this case with respect to the use and dissemination of discovery materials provided by the government, and has submitted a proposed order to that end.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: s/ T. Markus Funk  
T. MARKUS FUNK  
AMARJEET S. BHACHU  
Assistant U.S. Attorneys  
Chicago, IL 60604  
(312) 886-7635

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the following document:

**GOVERNMENT'S AGREED MOTION FOR A PROTECTIVE ORDER  
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were served on August 13, 2008, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/T. Markus Funk

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T. MARKUS FUNK

AMARJEET S. BHACHU

Assistant United States Attorney

219 South Dearborn Street

Chicago, Illinois

(312) 886-7635